

LAQUER, URBAN, CLIFFORD & HODGE LLP

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TRUSTEES OF THE OPERATING
ENGINEERS PENSION TRUST,
TRUSTEES OF THE OPERATING
ENGINEERS HEALTH AND WELFARE
FUND, TRUSTEES OF THE OPERATING
ENGINEERS VACATION-HOLIDAY
SAVINGS TRUST, TRUSTEES OF THE
OPERATING ENGINEERS TRAINING
TRUST, TRUSTEES OF THE
OPERATING ENGINEERS LOCAL 12
DEFINED CONTRIBUTION TRUST,
ENGINEERS CONTRACT COMPLIANCE
COMMITTEE FUND, and SOUTHERN
CALIFORNIA PARTNERSHIP FOR JOBS
FUND,

Plaintiffs,

v.

CONSOLIDATED STREET SWEEPING,
INC., a California corporation,

Defendant.

Case No.: 8:24-CV-00795-FWS-ADS

ASSIGNED TO THE HONORABLE
FRED W. SLAUGHTER

**NOTICE OF MOTION AND
MOTION FOR DEFAULT
JUDGMENT**

[Fed. R. Civ. Proc. 55(b)(2)]

**FILED SEPARATELY,
CONCURRENTLY AND IN
SUPPORT THEREOF:**

- 1. MEMORANDUM OF
POINTS AND
AUTHORITIES;**
- 2. DECLARATION OF
BERNARDO RAMOS;**
- 3. DECLARATION OF IGAL
KHOSHLESAN;**
- 4. DECLARATION OF
ANDREW QUINN
THOMPSON; AND**
- 5. [PROPOSED] JUDGMENT.**

Hearing Date

Date: August 29, 2024

Time: 10:00 a.m.

Ctrm: 10D

411 West Fourth Street
Santa Ana, CA 92701

1 TO THE HONORABLE FRED W. SLAUGHTER, THE CLERK OF THE UNITED
2 STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA, AND
3 DEFENDANT, CONSOLIDATED STREET SWEEPING, INC.:

4 **PLEASE TAKE NOTICE** that on August 15, 2024, at 10:00 a.m., or as soon
5 thereafter as counsel may be heard, Plaintiffs, Trustees of the Operating Engineers
6 Pension Trust, Trustees of the Operating Engineers Health and Welfare Fund,
7 Trustees of the Operating Engineers Vacation-Holiday Savings Trust, Trustees of the
8 Operating Engineers Training Trust, Trustees of the Operating Engineers Local 12
9 Defined Contribution Trust, Engineers Contract Compliance Committee Fund, and
10 Southern California Partnership for Jobs Fund, will, and hereby do, move the Court in
11 Courtroom 10D located at 411 West Fourth Street, Santa Ana, CA 92701, before the
12 Honorable Fred W. Slaughter, United States District Judge, for entry of default
13 judgment in favor of Trustees and against Defendant, Consolidated Street Sweeping,
14 Inc., a California corporation, for the principal amount of \$5,902.96 exclusive of
15 attorneys' fees and costs.

16 This motion will be made on the grounds that the complaint in this action was
17 filed on April 11, 2024, and served on Defendant on May 4, 2024. The declaration of
18 service was filed on May 8, 2024. No answer or other response to the complaint has
19 been filed, and Defendant's default was entered in the Civil Docket in the office of the
20 Clerk of this Court on June 11, 2024.

21 Defendant is a corporation and this motion does not seek a default judgment
22 against an infant or incompetent person, nor does the Soldiers' and Sailors' Relief Act
23 of 1940 or the Service members' Civil Relief Act apply in this action.

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1 This motion will be based on this notice of motion and motion, the declarations
2 of Bernardo Ramos, Igal Khoshlesan, and Andrew Quinn Thompson, the
3 memorandum of points and authorities filed herewith, the proposed judgment lodged
4 herewith, and on all the pleadings and documents on file herein.

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6 Dated: July 11, 2024

LAQUER URBAN CLIFFORD & HODGE LLP

7 By: /s/ - Andrew Quinn Thompson

8 Andrew Quinn Thompson, Counsel for
9 Plaintiffs, Trustees of the Operating Engineers
10 Pension Trust, et al.